

P. J. KB

COUNTY OF OZAUKEE
BOARD OF SUPERVISORS

ADMINISTRATION CENTER — P.O. BOX 994
PORT WASHINGTON, WISCONSIN 53074-0994

PHONES: Local (414) 284-8329
Metro (414) 238-8329

FAX: Local (414) 284-8100
Metro (414) 238-8100

July 6, 1994

AUG 12 1994

F.L.
Office of THE SECRETARY

RECEIVED

AUG 12 1994

Honorable Reed E. Hundt
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RE: Billed Party Preference

92-77

Dear Mr. Hundt:

I am the Chairperson for Ozaukee County Board, State of Wisconsin. I have been made aware that your Commission is considering changes in the current status regarding inmate phone call preferences. I am informed that you are contemplating using a billed party preference system which would allow the inmates to select their own long distance carrier for phone calls rather than use the service provided by the jail facility.

I am opposed to any change in the current system. As you may have heard from other parties, it is my belief that any change in the current system will interfere with the ability of our jail administration to control the inmates telephone use so as to prevent fraud and abuse. That is a very real concern and is something that is well controlled under the present system.

Additionally, the revenue generated under the current system is a benefit to the county taxpayer and to the jail system itself. Those funds can be used for various programs within the facility and for the general benefit of the county. A loss of those funds would impact fiscally on the counties and would, in some cases, deprive correction facilities of some present services. I believe that the positive aspects of any change are outweighed by the fiscal benefits lost.

Ozaukee County like many others is concerned with the telephone rates charged to prisoners. Ozaukee County does provide for reasonable rates and control over those rates. Ozaukee County is a fiscally responsible entity and is not in the business of overcharging its prisoners for such services. We believe we currently act responsibly and are therefore able to obtain the benefits of some additional income while exercising administrative control over the prisoners access to phones at a reasonable cost.

No. of Copies rec'd 0
List ABCDE

Mr. Hundt

-2-

July 6, 1994

Therefore, I wish to register my opposition, as Ozaukee County Chairperson, to any change in the current system. It is my belief that we currently run an efficient, cost effective phone system for the prisoners and no change is necessary nor desirable. I therefore ask you to reject any proposed changes in the current system and allow us to function as we have been for the reasons stated above.

Sincerely,

A handwritten signature in cursive script, reading "Leroy A. Bley". The signature is written in dark ink and is positioned above the typed name.

LEROY A. BLEY
Chairperson
County Board of Supervisors

LAB:DEK:af

c: Honorable James H. Quello
Honorable Andrew C. Barrett
Honorable Rachelle B. Chong
Honorable Susan Ness



DOCKET FILE COPY ORIGINAL
LARAMIE COUNTY SHERIFF'S DEPARTMENT

307 / 633-4700

1910 PIONEER AVENUE / CHEYENNE, WYOMING 82001

R. D. "RUDY" RESTIVO, SHERIFF

RECEIVED

AUG 12 1994

July 25, 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

The Honorable Reed E. Hundt, Chairman
Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

Re: Billed Party Preference;
CC Docket No. 92-77

Dear Chairman Hundt:

We are opposed to the application of Billed Party Preference (BPP) at inmate facilities.

Our Facility's security and administration needs require us to route inmate calls from our facility to a single carrier that is equipped to handle inmate calls and with whom we have a contractual relationship. For the protection of the public, we cannot allow inmates to have open access to the telecommunications network and the freedom to use any carrier they please. BPP will take away our right to coordinate inmate calls through a carrier we know and trust. Instead, inmate calls will be routed to a number of different carriers, that will have no accountability for fraudulent or threatening inmate calls. They will not have had any obligation to us and few will be trained to handle inmate calls.

We have found it necessary to install phone equipment that is specifically designed for inmate calls. This equipment helps prevent fraud, abusive calls and other criminal activity over the telephone network. Given the constant budgetary constraints that we are under, we cannot afford to provide this equipment without the help of inmate phone service providers. BPP would eliminate the revenue stream that finances our inmate phones. If BPP is applied to inmate facilities, there will be no way for us to finance these phones, nor will there be inmate phone service providers to assist us. Without inmate phones, the morale of our inmates will be devastated. The resulting increase in tension will make it more difficult for our staff to manage inmates.

Furthermore, we are sensitive to the rates inmate families pay for calls. We fully appreciate the FCC's concern if some Sheriffs do not take responsibility for protecting inmate families from abusive rates. We do not agree with the FCC that the solution for this lack of responsibility is BPP. It may be more appropriate to adopt rate ceilings on inmate calls and then let Sheriffs enforce these rate ceilings through their contracts. Indeed we believe the overwhelming majority of Sheriffs are committed to requiring rates that are fair and reasonable.

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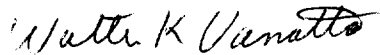
07-25-94

Page 2

In short, BPP would take away our ability to employ important security and administrative measures that we have found to be necessary at our facility, ultimately reducing inmate phone availability, which in turn decreases the efficiency of our staff. We urge you to not adopt regulations that interfere with our administrative and security decisions -- decisions that are clearly within our discretion and which we have a public responsibility to make.

Sincerely,

R. D. "Rudy" Restivo
Sheriff



by: Walter K. Vanatta
Captain, Facility Administrator

RDR:WKV:djb

cc: The Honorable James H. Quello
The Honorable Rachelle B. Chong
The Honorable Andrew C. Barrett
The Honorable Susan Ness

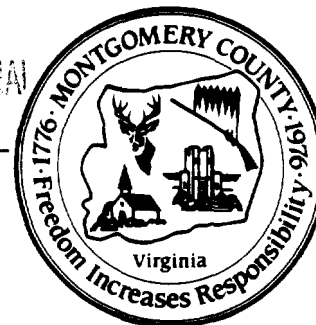
MONTGOMERY COUNTY SHERIFF'S OFFICE

KENNARD L. PHIPPS, SHERIFF

RECEIVED

AUG 12 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY



4 SOUTH FRANKLIN ST.
P.O. DRAWER 149
CHRISTIANSBURG, VA 24073
PHONE (703) 382-6906

The Honorable Reed E. Hundt, Chairman
Federal Communications Commission
1919 M Street NW
Washington, DC 20554

Re: CC Docket No. 92-77 Opposition to Billed Party Preference

August 1, 1994

Dear Chairman Hundt:

As the Sheriff of Montgomery County, Virginia and Administrator of the County Jail, I am vigorously opposed to any form of regulation of contract communications operators or long distance carriers that would, in any way, affect or jeopardize the present security and service of our inmate telephone system. I am specifically referring to the application of Billed Party Preference for O+ InterLATA Calls, or BPP, at inmate facilities.

Over the past six years our average inmate population has increased by over 50% while during that same period our Jail Staff has seen a force reduction of nearly 20% due to funding cuts. Currently, our jail houses a daily average of just over one hundred inmates. We have been successfully using the services and equipment of a private contract communications carrier/operator for more than three years. This automated telephone system, with its attendant control services, permit our staff to do their job more effectively while not having to worry about what is happening in this area of inmate needs.

Today, we enjoy a relatively harassment-free and low fraud incidence operation that has satisfied several needs outside of the communications arena because of the services and equipment provided by our contractor. Among these are the compensation derived from commissions of receivables from the collect calls billed to the inmates' called parties. These funds are deposited entirely into an inmate welfare account that has provided many educational, spiritual, and recreational enhancements to our inmate activities programs.

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The application of BPP will most likely remove any controls that we now have over various fraud elements and harassment techniques that inmates use against witnesses, judges, jurors, businesses, and employees. It is impossible to conceive how a potential witness or complainant could think (or remember) to protect themselves from threatening phone calls by an incarcerated inmate when the responsibility for that protection would fall directly on that person and their "designated" phone carrier. It takes only one threatening call to intimidate a witness or complainant. By using "PIN" numbers and approved number calling services and other controls, as provided by a dedicated inmate communications company, this type of problem is virtually eliminated.

To make the concept of BPP technologically equal to our present system will cost huge sums of money that will ultimately be burdened by the public. This would NOT benefit that public. If it is the intent of the FCC to protect the public from potential price-gouging by a few unscrupulous operators, then I would be in favor of a price ceiling system, directed at State level and administered by the Facilities through contract management, be imposed for this purpose. Currently, our phone bill receivables are split with our contractor in the form of nominal commissions. This billing is in line local BOC pricing and the fiscal advantage ultimately flows back to the inmates. Conversely, BPP will allow the carriers to probably maintain the same local BOC pricing levels, but with the ultimate fiscal advantage going only to those operators.

In summary: BPP does not present a viable alternative to the administrative and security controls that we have for effective criminal justice management in our jail. If this application were passed, it would cause us to lose control of telephone fraud activities originating from the jail and the harassment of witnesses, complainants, or victims. It would reduce or eliminate much-needed revenue that is used to operate State or Federally mandated inmate welfare and social reform programs. Programs that are NOT funded by those same mandates.

We urge you to not adopt this regulation.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "K. L. Phipps", written in a cursive style.

K. L. Phipps
Sheriff



EATON COUNTY SHERIFF DEPARTMENT

1025 INDEPENDENCE BLVD. • CHARLOTTE, MICHIGAN 48813 • TELEPHONE CHARLOTTE 517/543-3512
LANSING 517/372-8217

July 28, 1994

Rick Wahl
Sheriff

Patrick Hutting
Undersheriff

Joseph Jager
Chief Deputy

The Honorable Reed E. Hundt, Chairman
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

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AUG 12 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

RE: CC Docket No. 92-77 Opposition to Billed Party Preference

Dear Chairman Hundt,

We are opposed to the application of Billed Party Preference (BPP) at inmate facilities.

We have analyzed the security and administration needs at our facility and have found it to be necessary to route inmate calls from our facility to a single carrier that is equipped to handle inmate calls and with whom we have a contractual relationship. We cannot allow inmates to have open access to the telecommunications network and the freedom to use any carrier they please. BPP will take away our right to coordinate inmate calls through a carrier we know and trust. Instead, inmate calls will be routed to a number of different carriers, none of whom will have any obligation to us, and few that will be trained to handle inmate calls.

We have also found it necessary to install phone equipment that is specifically designed for inmate calls. This equipment helps prevent fraud, abusive calls, and other criminal activity over the telephone network. Given the constant budgetary constraints that we are under, we cannot afford to provide this equipment without the help of inmate phone service providers. BPP would also eliminate the revenue stream that finances our inmate phones. If BPP is applied to inmate facilities, there will be no way for us to finance these phones, nor will there be inmate phone service providers to assist us. Without inmate phones, the morale of our inmates will be devastated. The resulting increase in tension will make it more difficult for our staff to manage inmates.

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Furthermore, we are sensitive to the rates inmate families pay for calls. We fully appreciate the FCC's concern if some Sheriffs do not take responsibility for protecting inmate families from abusive rates. We do not agree with the FCC that the solution for this lack of responsibility is BPP. The proper and more effective action would be to adopt rate ceilings on inmate calls and then let Sheriffs enforce these rate ceilings through their contracts. Indeed we believe the overwhelming majority of Sheriffs are committed to requiring rates that are fair and reasonable.

In short, BPP would take away our ability to employ important security and administrative measures that we have found to be necessary at our facility, ultimately reducing inmate phone availability, which in turn decreases the efficiency of our staff. We urge you not to adopt regulations that interfere with our administrative security and decisions -- decisions that are clearly within our discretion and which we have a public responsibility to make.

Respectfully Submitted,

A handwritten signature in black ink that reads "Rick Wahl". The signature is written in a cursive, flowing style.

Rick Wahl

Sheriff

FILE COPY ORIGINAL

RECEIVED

July 22, 1994

AUG 12 1994

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

The Honorable Reed E. Hundt, Chairman
Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

Re: CC Docket No. 92-77 Opposition to Billed Party Preference

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In short, BPP would take away our ability to employ important security and administrative measures that we have found to be necessary at our facility, ultimately reducing inmate phone availability, which in turn decreases the efficiency of our staff. We urge you to not adopt

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List ABCDE



Marin County Sheriff's Department

DOCKET FILE COPY ORIGINAL

CHARLES T. PRANDI

Sheriff

RECEIVED ROBERT T. DOYLE

Undersheriff

July 28, 1994

AUG 12 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

The Honorable Reed E. Hundt, Chairman
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

RE: Billed Party Preference; CC Docket No. 92-77

Dear Chairman Hundt:

As Sheriff of Marin County, California and a Jail Administrator, I am requesting the Federal Communications Commission exclude local jails from the proposed "billed party preference" system for 0 + Inter LATA payphone traffic rules.

As I am sure other Jail Administrators have told you, eliminating the 0 + commissions received currently would have the effect of creating a host of unfunded mandates. California jails have Inmate Welfare Funds, which are, by law, to provide for programs, services and facilities for inmates. Telephone commissions are the primary, in some cases sole, source of revenue for Inmate Welfare Fund. Many of these programs and services are now mandated by law and the courts, primarily the Federal courts. Elimination of commission revenues would force jails to tap already strapped budgets to fund these mandates.

The services and programs provided by the Inmate Welfare Fund includes Adult Education, GED Programs, basic literacy training, job training, substance abuse and family counseling, Chaplains, religious services and many more. Even basics such as supplying indigent inmates with personal hygiene supplies and letter writing materials are provided for by this fund.

AREA CODE 415

24-HOUR NUMBER
499-7233

WARRANTS
499-7297

RECORDS
499-7284

CIVIL
499-7282

JAIL
499-7316

HONOR FARM
499-6655

PATROL
499-7233

DETECTIVES
499-7265

EMERGENCY
SERVICES
499-6584

MAJOR CRIMES
TASK FORCE
492-1115

ADMINISTRATION
499-7250

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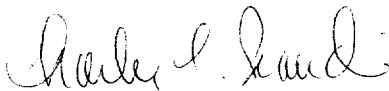
0

Chairman Hundt
July 28, 1994
Page Two

While there may be ways to prevent fraud under B.P.P., we would be losing our ability to closely monitor phone calls during investigations and would likely lose our ability to quickly block calls to protect victims and witnesses from intimidation and family and friends from unwanted calls and harassment. These issues are very important to me and the citizens of Marin County.

Before you make any decision, please stop and listen to the thousands of local jails that will be dramatically and adversely impacted by your failure to exclude them from the B.P.P. System. Every State has different laws governing its jails. I can only speak for our California laws and under them failure to exclude jails would be devastating.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Charles T. Prandi".

CHARLES T. PRANDI
SHERIFF

CTP/tb

cc: The Honorable James H. Quello
The Honorable Andrew C. Barrett
The Honorable Rachelle B. Chong
The Honorable Susan Ness

August 1, 1994

DOCKET FILE COPY ORIGINAL

Oregon

The Honorable Reed E. Hundt
Federal Communications Commission
1919 M Street N.W.
Washington, D.C. 20554

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AUG 12 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

DEPARTMENT OF
CORRECTIONS

OFFICE OF
THE DIRECTOR

Re: Billed Party Preference: CC Docket No. 92-77

Dear Chairman Hundt:

The Oregon Department of Corrections is opposed to the application of Billed Party Preference (BPP) at inmate facilities.

We have contracted with service providers for our 12 institutions. We have two types of phone systems for inmate use: general telephones and legal use telephones. The general use telephones are monitored for security purposes and the legal use telephones are used for communication between inmates and their attorneys or the courts.

While the majority of inmates use the general telephones in the institutions to maintain their relationships to families and friends, there is still a significant number who try to use the telephones to commit crimes. Examples of the types of criminal activity the Department of Corrections has uncovered during monitoring of inmate calls during the last year include:

- homicide
- child abuse
- drug manufacture and trafficking
- credit card fraud using three-way calling
- cases of intimidation involving drugs

Our current contracts and system give us the capability to block calls being made to particular numbers to prevent harassing phone calls and eliminates the call from being transferred. **We must be able to continue monitoring inmate calls to provide security in the institutions for both staff and inmates.**

Revenues in a six month period in 1993 totaled approximately \$180,000 from inmate phones usage. These dollars were deposited into our Inmate Welfare Fund to benefit the general inmate population. The funds are used a variety of ways, including: capital construction and improvements projects to enhance the programs, services and activities provided to inmates. During these times of budgetary cuts, the dollars generated have become more significant than ever before. It would be impossible to continue to fund these projects without this source of revenue.

Barbara Roberts
Governor




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2575 Center Street NE
Salem, OR 97310
(503) 945-0920
FAX (503) 373-1173

Reed. E. Hundt
August 1, 1994
Page 2

BPP would eliminate our ability to employ critical security and administrative measures which are necessary safeguards at our prisons as well as effect the programs we deliver to inmates. For these reasons, I respectfully request an exemption for prison inmate telephone systems to the proposed modifications of the Federal Communications Commission rules.

Sincerely,



Frank A. Hall
Director

CC: Commissioner James H. Quello
Commissioner Andrew C. Barrett
Commissioner Rachelle B. Chong
Commissioner Susan Ness
Senator Mark Hatfield
Senator Bob Packwood
Representative Elizabeth Furse
Representative Robert Smith
Representative Ron Wyden
Representative Peter DeFazio
Representative Mike Kopetski



Agency of Human Services
 DEPARTMENT OF CORRECTIONS
 103 South Main Street
 Waterbury, VT 05671-1001
 Phone: (802) 241-2263

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AUG 12 1994

FEDERAL COMMUNICATIONS COMMISSION
 OFFICE OF THE SECRETARY

July 25, 1994

The Honorable Reed E. Hundt, Chairman
 Federal Communications Commission
 1919 M Street N.W.
 Washington DC 20554

Dear Chairman Hundt:

The Vermont Department of Corrections offers the following comments regarding Billed Party Preference - CC Docket No. 92-77.

Telephone service is provided to inmates of our correctional facilities. Cost savings, or any financial benefit derived from the use of the telephone system, are returned to the inmates through institution recreation funds. It is not the intention of the Vermont Department of Corrections to profit from inmate telephone use.

It is extremely important to correctional officials to be able to control the telephone system. We can document incidents of fraud being perpetrated on mail order companies, and others, through inmate use of telephones. There are also incidents of threats to witnesses and victims by unrestricted use of telephones by inmates.

Telephone system control is an absolute necessity, in the event there is a disturbance in a correctional facility. Telephones quickly become the only means of communication with rioting inmates. Restricting the use of the telephone in these situations allows correctional officials to limit the ability of perpetrators to obtain aid from outside sources and to keep a focus on the de-escalation of the situation.

Some inmates will be able to continue the types of crimes for which they are incarcerated, if Billed Party Preference is allowed. Some sex offenders will continue to make obscene phone calls, intimidate victims and terrorize anyone they wish. Prison gang members will arrange killings, deliveries of drugs and any number of other gang related activities, if Billed Party Preference is allowed.

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Honorable Reed E. Hundt
July 25, 1994

Billed Party Preference, if adopted, can have a significant negative impact on corrections and warrants careful consideration. If I can provide additional information, I may be reached at (802) 241-2316.

Sincerely,

A handwritten signature in black ink, reading "Michael T. O'Malley". The signature is written in a cursive, flowing style with a large, prominent "M" and "O".

Michael T. O'Malley
Director, Security and
Supervision

MOM/wac

cc: John F. Gorczyk, Commissioner
Richard C. Turner, Director, Correctional Services

92-77

DOCKET FILE COPY ORIGINAL

TO: Sheriffs and Jail Administrators

FROM: Vincent Townsend, President, Pay Tel Communications, Inc.
APCC Inmate Phone Service Providers Task Force
1 (800) 729-8355

DATE: July 21, 1994

SUBJECT: Letter Opposing Billed Party Preference

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AUG 12 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

We have been very encouraged by the comments and letters filed with the FCC opposing Billed Party Preference ("BPP") by Sheriffs and Jail Administrators from across the country. To date we have received comments from organizations in 26 states. These comments have done a very excellent job in articulating the numerous concerns that BPP raises for Sheriffs and Jail Administrators.

Our only concern now is that we need your letter on this very important issue. The only way to convince the FCC not to apply BPP to inmate phones is to make them aware of the large number of Sheriffs and Jail Administrators that are convinced BPP will be a disaster for inmate phones.

Please compose your own letter or use the attached sample letter and add your own examples. Your immediate action on this issue is extremely important. All letters must be received by the FCC by Monday, August 1, 1994.

Your letters should be addressed to the Chairman of the FCC as follows:

The Honorable Reed E. Hundt
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: Billed Party Preference; CC Docket No. 92-77

Don't forget to send a copy of your letter to the other four commissioners at the same address:

The Honorable James H. Quello
The Honorable Rachelle B. Chong

The Honorable Andrew C. Barrett
The Honorable Susan Ness

You should also send copies of your letters to your Representatives and Senators asking them to write the FCC. Please send us a copy of your letter: APCC Inmate Phone Service Providers Task Force, P.O. Box 8179, Greensboro, N.C. 27419.

No. of Copies rec'd
List ABCDE

1

Swisher County



SHERIFF'S OFFICE

Larry P. Stewart, Sheriff

Phone 995-3326

TULIA, TEXAS 79088

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

July 25, 1994

The Honorable Reed E. Hundt, Chairman
Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

Re: CC Docket No. 92-77 Opposition to Billed Party Preference

Dear Chairman Hundt:

We are opposed to the application of Billed Party Preference at inmate facilities.

We have analyzed the needs at our facility and have found it to be necessary to route inmate calls from our facility to a single carrier that is equipped to handle inmate calls and with whom we do have a contract with. We cannot allow inmates to have open access to the telecommunications network and the freedom to use any carrier they please. BPP will take away our right to coordinate inmate calls through a carrier we know and trust. Instead inmate calls will be routed to a number of different carriers, none of whom will have any obligation to us and few that will be trained to handle inmate calls.

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Furthermore, we are sympathetic to the rates inmate families pay

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Swisher County



SHERIFF'S OFFICE

Larry P. Stewart, Sheriff

Phone 995-3326

TULIA, TEXAS 79088

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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BPP would take away our ability to employ important security and administrative measures that we have found to be necessary at our facility, ultimately reducing inmate phone availability, which in turn decreases the efficiency of our staff. We urge you to not adopt regulations that interfere with our administrative and security decision. Decisions that are clearly within our discretion and which we have a public responsibility to make.

Respectfully submitted,

Richard Cagle, Jail Administrator
Swisher County Sheriff's Office
136 E Broadway, Tulia, Texas 79088



DOCKETED COPY

Sheriff's Department

Circuit Court Building - P.O. Box 819 - 225 South Fourth Street
Wytheville, Virginia 24382
703/228-5575

G. Wayne Pike, Sheriff

Ardelia Schreiber
Administrative Assistant

July 27, 1994

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AUG 12 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

The Honorable Reed D. Hundt
Chairman
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

Re: CC Docket #9277
Opposition to Billed
Party Preference

Dear Chairman Hundt:

We are adamantly opposed to the impending BPP at our correctional facility. Over the years we have sought to have a workable inmate phone system at our facility. We now have that. The system we have at present does several things that is unanimously supported by our law abiding tax payers. It does the following:

1. This system, and its related computerized data bank, gives us control and coordination.
2. It eliminates the ability for criminals to use telephones for fraud and other criminal activity.
3. It makes the criminal and their association responsible for the finances for their phone use, not the tax payers.
4. It gives the inmates unlimited access to telephones, which helps to control their behavior and frees the jail staff to perform more important tasks.

I am asking that you do not take away our control over security and administration of our jail facility. It seems to me that it would be much easier to require sheriffs to place restraints on excessive phone rates, rather than to eliminate a system that works extremely well, such as we now have. I

No. of Copies rec'd 0
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Swisher County



SHERIFF'S OFFICE

Larry P. Stewart, Sheriff

Phone 995-3326

TULIA, TEXAS 79088

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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Respectfully submitted,

Richard Cagle, Jail Administrator
Swisher County Sheriff's Office
136 E Broadway, Tulia, Texas 79088



DOCKETED COPY FILED IN

Sheriff's Department

Circuit Court Building - P.O. Box 819 - 225 South Fourth Street
Wytheville, Virginia 24382
703/228-5575

G. Wayne Pike, Sheriff

Ardelia Schreiber
Administrative Assistant

July 27, 1994

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

The Honorable Reed D. Hundt
Chairman
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

Re: CC Docket #9277
Opposition to Billed
Party Preference

Dear Chairman Hundt:

We are adamantly opposed to the impending BPP at our correctional facility. Over the years we have sought to have a workable inmate phone system at our facility. We now have that. The system we have at present does several things that is unanimously supported by our law abiding tax payers. It does the following:

1. This system, and its related computerized data bank, gives us control and coordination.
2. It eliminates the ability for criminals to use telephones for fraud and other criminal activity.
3. It makes the criminal and their association responsible for the finances for their phone use, not the tax payers.
4. It gives the inmates unlimited access to telephones, which helps to control their behavior and frees the jail staff to perform more important tasks.

I am asking that you do not take away our control over security and administration of our jail facility. It seems to me that it would be much easier to require sheriffs to place restraints on excessive phone rates, rather than to eliminate a system that works extremely well, such as we now have. I

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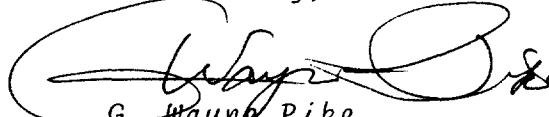
Page 2

The Honorable Reed D. Hundt

can tell you now that the tax payers in this area support my ideas in this matter.

Thank you for your time and attention to my correspondence.

Sincerely,



G. Wayne Pike
Sheriff

GWP:ats

cc: The Honorable James H. Quello
The Honorable Rachelle B. Chong
The Honorable Andrew C. Barrett
The Honorable Susan Ness
The Honorable Rick Boucher, Congressman
The Honorable L. F. Payne, Congressman
The Honorable Charles S. Robb, Senator
The Honorable John W. Warner, Senator
APCC Inmate Phone Service Providers Task Force
Billy R. Branson, County Administrator



State of Illinois • Jim Edgar, Governor

DEPARTMENT OF CENTRAL MANAGEMENT SERVICES

Stephen B. Schnorf, Director

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

July 28, 1994

The Honorable Reed E. Hundt
Federal Communications Commission
1919 M Street, NW
Washington, D. C. 20554

Re: Billed Party Preference
CC Docket No. 92-77

Dear Commissioner Hundt:

The Illinois Department of Central Management Services is opposed to your proposal to impose billed party preference on collect calls made by prison inmates.

The Illinois Department of Central Management Services is the State agency responsible for providing telecommunications services to all State agencies in Illinois, including those facilities operated by the Department of Corrections. The Department of Corrections has indicated its opposition, and we adopt its position.

We would further note that:

1. There will be a tremendous cost to convert to BPP such that it cannot be considered cost effective.
2. Pay phones or phones to be placed in prisons and other institutions will not necessarily generate revenue for the owners of the phones. The initiative for anyone to place these phones will disappear.
3. Prisons have phones, privacy booths, security equipment, recording equipment which would no longer be provided. The calls are provided (in Illinois) at tariffed rates, with no add on charges for the billed party. Tariff rates by definition should be fair to the billed party and there should be no push to make a change to a fair system which would cause such great disruption.

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4. The reason provided for the BPP effort seems to be the experience at some hotels and locations where the phone owners have been particularly greedy in their charges for making calls. There would be numerous ways to protect the public from these overcharges, and comprehensive BPP is not one of the ways.

We ask for your favorable consideration.

Sincerely,



W. M. Vetter, Manager
Bureau of Communication and Computer
Services

WMV:dd

cc: The Honorable James H. Quello
The Honorable Rachelle B. Chong
The Honorable Andrew C. Barrett
The Honorable Susan Ness



City of Chicago
Richard M. Daley, Mayor

Department of Aviation

David R. Mosena
Commissioner

Chicago O'Hare
International Airport

P.O. Box 66142
Chicago, Illinois 60666
(312) 601-8333 (TT / TDI)

July 29, 1994

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

The Honorable Reed Hundt
Chairman
Federal Communications Commission
1919 M Street, N.W.
Washington, D. C. 20554

Re: Billed Party Preference
CC Docket No. 92-77

Dear Mr. Hundt:

The Federal Communications Commission is considering the implementation of Billed Party Preference (BPP). The City of Chicago's Department of Aviation believes that the implementation of this program would have negative implications to the Chicago Airport System and the nearly 70,000,000 passengers using our facilities.

The income we receive through our 1,900 public pay phones is in the millions of dollars. Billed Party Preference would substantially decrease this revenue generated to the Department of Aviation. The effect of this would cause the rent paid by the airlines using O'Hare International Airport, Midway Airport and Meigs Airport to increase by a direct proportion. In addition, the contracts with our public pay phone providers currently allows for participation of 4 Disadvantaged Business Enterprises (DBE) in 35% of the public phones at the airports. Should BPP be implemented these DBE firms would also lose substantial income from the Chicago airports as well as many jobs benefiting minorities.

We feel that BPP is not necessary because existing equal access arrangements already allow our passengers to reach their carrier of choice. Both Federal and Illinois law already ensure that pay phone users access to their carrier of choice will not be blocked.

We ask that you not implement Billed Party Preference, its questionable consumer benefits and high cost of implementation or other efforts which would limit our freedom to manage this very important public service and income generating tool.

Sincerely,


ROBERT J. REPEL
Deputy Commissioner
Intergovernmental Affairs

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